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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:16-cr-00063-APG-PAL
Plaintiff,)	
)	STIPULATION FOR PROTECTIVE
vs.)	ORDER
)	
VIRAB TOROSYAN,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States, and Donald J. Green, Esq., counsel for defendant VIRAB TOROSYAN, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers' license numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents."

The parties state as follows:

1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including for example, social security numbers, drivers' license numbers, dates of birth, and addresses, of participants, witnesses, and victims in this case.

1 2. Discovery in this case is estimated to be hundreds of pages in length. Given the
2 nature of the allegations and the facts and circumstances surrounding the crimes with which the
3 defendant is charged, that is, that the defendant stole or otherwise fraudulently acquired the
4 personal identifying information (PII) and financial credit card and debit account information to
5 commit various identity theft and access device fraud crimes, many of the documents in the
6 discovery necessarily include personal and financial identifiers. Redacting the personal
7 identifiers of participants, witnesses, and victims would prevent the timely disclosure of
8 discovery to defendant.

9 3. The United States agrees to provide Protected Documents without redacting the
10 personal identifiers of participants, witnesses, and victims.

11 4. Access to Protected Documents will be restricted to persons authorized by the
12 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
13 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

14 5. The following restrictions will be placed on defendant, defendant's attorney(s)
15 and the above-designated individuals unless and until further ordered by the Court. Defendant,
16 defendant's attorneys and the above-designated individuals shall not:

17 a. make copies for, or allow copies of any kind to be made by any other
18 person of Protected Documents;

19 b. allow any other person to read Protected Documents; and

20 c. use Protected Documents for any other purpose other than preparing to
21 defend against the charges in the Indictment or any further superseding indictment arising out of
22 this case.

6. Defendant's attorney(s) shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as social security numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

8. Upon conclusion of this action, defendant's attorney(s) shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as social security numbers, drivers' license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the last appeal is final.

DANIEL G. BOGDEN
United States Attorney

/s/Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney

March 8, 2016
DATE

/s/Donald J. Green, Esq.
Donald J. Green, Esq.,
Counsel for defendant VIRAB TOROSYAN

March 8, 2016
DATE

ORDER

IT IS SO ORDERED this 11th day of March, 2016.


UNITED STATES DISTRICT/MAGISTRATE COURT JUDGE